

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
vs.) NO. 03-30047-MAP
)
MELVIN RICHARDSON)

DEFENDANT'S MOTION FOR ADDITIONAL DISCOVERY

Now comes the defendant in the above entitled action and moves this Honorable Court for an order directing the Government to produce the below described discovery requests and asserts as his basis therefore the following:

The defendant previously moved for the discovery of information related to the Government's use of a Confidential Informant in the prosecution of the Government case.

The defendant believes the Government is in possession of additional discovery which falls with the purview of the discovery previously ordered provided to the defendant by court order on his prior discovery requests

These include the following:

- 1) a copy from the original of the application and authorization to initiate the investigation directed against the defendant,
- 2) a copy from the original of any application or authorization purporting to grant the confidential informant permission to engage in criminal activity,
- 3) a copy from the original of each written authorization permitting the investigating agents to provide the defendant with firearms,
- 4) a copy from the original of any and all suitability reports and/or recommendation for the confidential informant utilized here,
- 5) a copy from the original of any application for authorization to permit the confidential informant to engage in any level of criminal activity,
- 6) a copy from the original of the informant performance record for the agent directly responsible for the informants supervision,
- 7) any document reflecting the confidential informants registration with the Department of Justice, Treasury Department, or any law enforcement agency acting thereunder,
- 8) a copy from the original of any written approval authorizing the use of the confidential informant executed by the Confidential Informant Review Committee of the Department of Justice or Treasury Department.

Wherefore the defendant asserts said information is reasonable and necessary to the proper preparation of his defense to the charges against him.

DEFENDANT

By: /s/ Vincent A. Bongironi
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CERTIFICATE OF SERVICE

I, Vincent A. Bongironi, Esq., hereby certify that I have served a copy of the foregoing to Assistant United States Attorney Paul Smyth, 1550 Main Street, Springfield, MA 01103 this 16th day of September, 2005.

/s/ Vincent A. Bongironi
Vincent A. Bongironi